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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO FIFTY-SEVENTH  
THROUGH FIFTY-NINTH OMNIBUS  
OBJECTIONS TO CLAIMS AND REQUEST  
FOR ORDERS BY DEFAULT AS TO  
UNOPPOSED OBJECTIONS**

**[Re: Dkt. Nos. 10037, 10040, and 10043]**

**Resolving Objections Set for Hearing  
March 9, 2021 at 10:00 a.m. (Pacific Time)**

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PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter orders by default on the following omnibus claims objections (collectively, the “**Omnibus Objections**”):

Docket Number	Omnibus Objection
10037	<i>Reorganized Debtors’ Fifty-Seventh Omnibus Objection to Claims (Books and Records Claims)</i> (the “ <b>Fifty-Seventh Omnibus Objection</b> ”)
10040	<i>Reorganized Debtors’ Fifty-Eighth Omnibus Objection to Claims (Satisfied Claims)</i> (the “ <b>Fifty-Eighth Omnibus Objection</b> ”)
10043	<i>Reorganized Debtors’ Fifty-Ninth Omnibus Objection to Claims (No Liability Claims)</i> (the “ <b>Fifty-Ninth Omnibus Objection</b> ”)

## RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS

The Omnibus Objections seek to either (a) disallow and/or expunge or (b) allow in reduced amounts the Proofs of Claim listed in Exhibit 1 to each Omnibus Objection.

## NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 10039, 10042, and 10045]. The Omnibus Objections also were supported by the respective declarations of Robb McWilliams [Docket Nos. 10038, 10041, and 10044]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as described in the *Certificate of Service of Alain B. Francoeur*, filed on February 4, 2021 [Docket No. 10091] (the “**Certificate of Service**”). As further described in the Certificate of Service, on January 29, 2021, each holder of a claim listed on Exhibit 1 to the Omnibus Objections received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and/or expunged or allowed in a reduced amount.

and, if applicable (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
<b>Fifty-Seventh Omnibus Objection</b>			
Informal	Southern Counties Oil Co., a Calif. LP	1325	The Fifty-Seventh Omnibus Objection is WITHDRAWN with respect to this Claim.
Informal	Fair Harbor Capital LLC as Assignee of Career Institute Inc	8167	The Fifty-Seventh Omnibus Objection is WITHDRAWN with respect to this Claim.
<b>Fifty-Eighth Omnibus Objection</b>			
Informal	California Department of Tax and Fee Administration	3287	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to March 10, 2021. If the objection cannot be resolved, it will be continued to March 24, 2021.
<b>Fifty-Ninth Omnibus Objection</b>			
Informal	Bradcon, LLC dba Bradley Concrete	74876	Claimant has reported to the Reorganized Debtors that it is withdrawing its Claim.

**DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors
- I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objections except as described herein.
- This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders (1) disallowing and expunging the Proofs of Claims listed in the column headed "Claim/Schedule To Be Disallowed and

1 Expunged” in **Exhibit 1** to this Request and (2) allowing in the specified “Reduced Claim Amount”  
2 the Claims listed in **Exhibit 1** to this Request, which listed Claims are identical to those listed in  
3 Exhibit 1 to the Omnibus Objections, except as otherwise discussed above.

4 Dated: March 2, 2021

**KELLER BENVENUTTI KIM LLP**

5 By: /s/ Dara L. Silveira  
6 Dara L. Silveira

7 *Attorneys for Debtors and Reorganized Debtors*  
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